

Nathan Cohen
Evan M. Newman
JACOBOWITZ NEWMAN TVERSKY LLP
Attorneys for Chaim Kahan
377 Pearsall Avenue, Suite C
Cedarhurst, NY 11516

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK**

-----X
In re:

960 Franklin Owner LLC,

Case No.: 1-22-42760-jmm

-----X
NOTICE OF APPEARANCE

PLEASE TAKE NOTICE that:

1. Under Federal Rules of Bankruptcy Procedure 2002, 9007 and 9010(b), and 11 U.S.C. §§ 102(1), 342 and 1109(b), the undersigned attorneys appear as counsel for Chaim Kahan, a party in interest, and request that all notices given or required to be given in this case and all related cases and proceedings, and all papers served or required to be served in this case and all related cases and proceedings, be given to and served upon:

Nathan Cohen, Esq.
Jacobowitz Newman Tversky LLP
377 Pearsall Avenue, Suite C
Cedarhurst, New York 11516
Tel: (516)-545-0343
Fax: (212) 671-1883
Email: ncohen@jntllp.com

2. The foregoing request includes not only the notices and papers, whether formal or informal, ex parte or no notice, written or oral, referred to in the Bankruptcy Rules and Code Sections specified above, but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint, or demand, whether formal or informal,

whether written or oral and whether transmitted or conveyed by mail, courier, hand, delivery, telephone, telecopier, electronically, or otherwise, which affect or seek to affect in way the Debtor, any right or interests of the Debtor, or affects or seeks to affect, any rights or interest of any party in interest in this case or any related proceeding.

3. Neither this notice of appearance nor any later appearance, pleading, claim, or suit, shall waive the rights of Chaim Kahan, to have final orders in noncore matters entered only after *de novo* review by a District Judge, or the right to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case; or the right to have the District Judge withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or to adjudicate rights in other applicable forums, or any other rights, claims, actions, defenses, setoffs, or recoupments, to which these entities are or may be entitled under agreements, in law or in equity, all of which rights are expressly reserved.

Dated: April 4, 2023

Jacobowitz Newman Tversky LLP

By: /s/ Nathan Cohen

Nathan Cohen
377 Pearsall Avenue, Suite C
Cedarhurst, New York 11516
Tel: (516) 545-0343
Fax: (212) 671-1883